

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15-cv-00113-KS-RHW

TORSTAR CORPORATION (DBA
TORONTO STAR NEWSPAPERS LTD.)
PETER EDWARDS

DEFENDANT'S

**DECLARATION OF KATHY ENGLISH IN SUPPORT OF TORSTAR CORPORATION
AND PETER EDWARDS'S MOTION TO DISMISS
PLAINTIFF'S CIVIL COMPLAINT FOR DAMAGES**

I, Kathy English, declare that:

1. I am Public Editor of the Toronto Star Newspapers Limited ("TSNL"), a wholly-owned subsidiary of the defendant Torstar Corporation. I have personal knowledge of all of the facts set forth in this Declaration based upon information obtained from various sources, including my own personal knowledge and experience as counsel for Torstar Corporation as well as documents and records maintained in the regular course of business. I make this Declaration based on my personal knowledge and reliable business records and sources of information as to the following facts and circumstances, and I could and would competently testify to these matters if called as a witness.

2. Torstar Corporation is a Canadian company whose subsidiary, TSNL, operates an online news site titled *The Toronto Star* in Canada. *The Toronto Star* reports on local, Canadian and international news most relevant to its readers in Canada. Its circulation and readership is almost entirely in the Toronto region, in Ontario, Canada.

3. Peter Edwards is a reporter for *The Toronto Star*, and he is a resident of Canada.

EXHIBIT

A

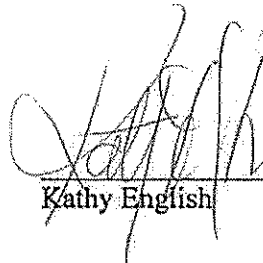
4. On February 24, 2014, an article entitled "Nova Scotia Couple Wins Copyright Lawsuit against Homophobic U.S. Blogger" was published on *The Toronto Star's* website. According to the Adobe Marketing Cloud, which is recognized in Canada as an accurate and reliable source of reports on on-line views of Canadian publications, through March 30, 2015, there had been 12,691 page views of the subject article. Only 10 page views were in Mississippi; 10,997 page views were in Canada. See Exhibit 1, attached.

5. Torstar Corporation and TSNL do not have offices in Mississippi or any employees in Mississippi. Torstar Corporation and TSNL do not solicit business in Mississippi or derive any income from Mississippi customers.

6. Torstar Corporation first learned of Mr. Douglas Handshoe's lawsuit upon receipt of the Complaint on March 16, 2015. Torstar has not received any other correspondence or notice from Mr. Handshoe regarding the subject article.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 23, 2015.


Kathy English

Pages Report

Report Suite: ARCHIVE - The Star Prod Desktop (pre 2015)

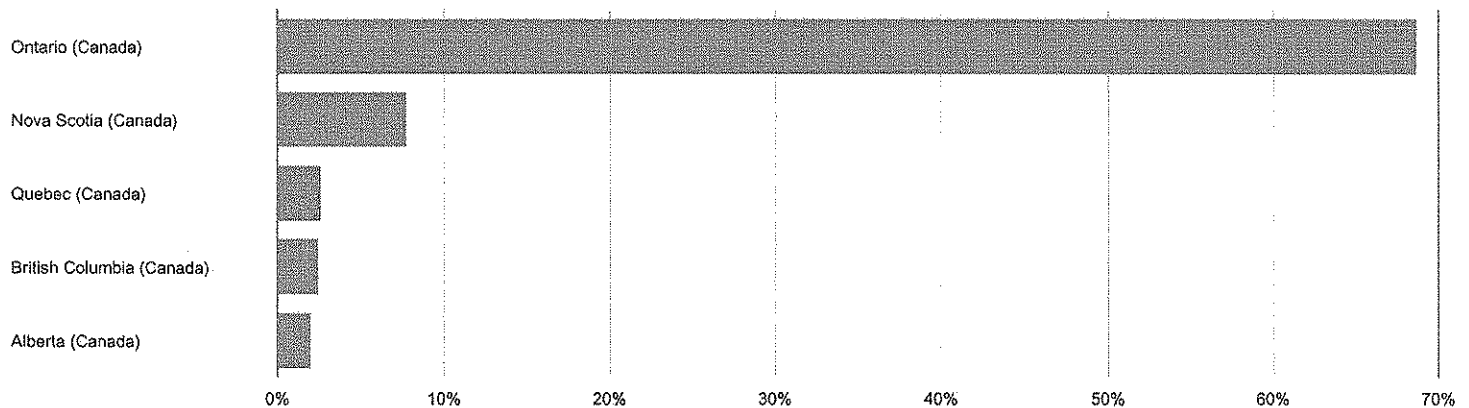
Date: Sat. 1 Feb. 2014 - Mon. 30 Mar. 2015

Segment: All Visits (No Segment)

Report Type: Ranked
 Selected Metrics: Page Views
 Broken Down by: Regions
 Data Filter: None

Compare to Report Suite: None
 Compare to Segment: None
 Selected Pages: News|Canada|Article|2014|02|24|
 nova_scotia_couple_wins_lawsuit_against_homophobic_american_blogger
 Percent Shown as: Number
 Include Current Data: No

Page Views



Pages Report | All Visits (No Segment) | Sat. 1 Feb. 2014 - Mon. 30 Mar. 2015 | Graph generated by Adobe Analytics at 3:36 PM EDT, 30 Mar 2015

Pages by Regions		Page Views	
1.	News Canada Article 2014 02 24 nova_scotia_couple_wins_lawsuit_against_homophobic_american_blogger	12,691	
1.	Ontario (Canada)	8,717	68.7%
2.	Nova Scotia (Canada)	978	7.7%
3.	Quebec (Canada)	333	2.6%
4.	British Columbia (Canada)	315	2.5%
5.	Alberta (Canada)	255	2.0%
6.	Florida (United States)	194	1.5%
7.	California (United States)	153	1.2%
8.	New Brunswick (Canada)	150	1.2%
9.	New York (United States)	133	1.0%
10.	Newfoundland and Labrador (Canada)	85	0.7%
11.	Manitoba (Canada)	84	0.7%
12.	Texas (United States)	76	0.6%
13.	New Jersey (United States)	68	0.5%
14.	Massachusetts (United States)	65	0.5%
15.	Pennsylvania (United States)	49	0.4%
16.	Illinois (United States)	42	0.3%
17.	Prince Edward Island (Canada)	37	0.3%
18.	Virginia (United States)	35	0.3%
19.	Saskatchewan (Canada)	33	0.3%
20.	Michigan (United States)	30	0.2%
21.	North Carolina (United States)	26	0.2%
22.	Maryland (United States)	26	0.2%
23.	Washington (United States)	26	0.2%
24.	Ohio (United States)	25	0.2%
25.	Georgia (United States)	23	0.2%
26.	Arkansas (United States)	21	0.2%
27.	Arizona (United States)	21	0.2%

EXHIBIT

1

Pages Report

Report Suite: ARCHIVE - The Star Prod Desktop (pre 2015)

Date: Sat. 1 Feb. 2014 - Mon. 30 Mar. 2015

Segment: All Visits (No Segment)

Pages by Regions		Page Views	
1.	News Canada Article 2014 02 24 nova_scotia_couple_wins_lawsuit_against_homophobic_american_blogger	12,691	
28.	Minnesota (United States)	20	0.2%
29.	Louisiana (United States)	19	0.1%
30.	District of Columbia (United States)	16	0.1%
31.	Colorado (United States)	16	0.1%
32.	Missouri (United States)	16	0.1%
33.	Bayern (Germany)	14	0.1%
34.	New South Wales (Australia)	13	0.1%
35.	Jalisco (Mexico)	11	0.1%
36.	Central (Singapore)	10	0.1%
37.	Connecticut (United States)	10	0.1%
38.	Mississippi (United States)	10	0.1%
39.	Yukon Territory (Canada)	10	0.1%
40.	Nordrhein-Westfalen (Germany)	9	0.1%
41.	Victoria (Australia)	9	0.1%
42.	London (United Kingdom)	8	0.1%
43.	South Carolina (United States)	8	0.1%
44.	Rhode Island (United States)	8	0.1%
45.	Hong Kong (Hong Kong)	8	0.1%
46.	Wisconsin (United States)	8	0.1%
47.	Hamerkaz (Israel)	8	0.1%
48.	Indiana (United States)	8	0.1%
49.	Queensland (Australia)	8	0.1%
50.	New Hampshire (United States)	8	0.1%